To: Bryson, Joe[Bryson.Joe@epa.gov]
Cc: Jeremy Fisher[jfisher@synapse-energy.com]
From: DeYoung, Robyn
Sent: Tue 12/15/2015 3:51:09 PM
Subject: Re: gross v net ... why i think net makes sense

Hi Jeremy

Any thoughts in response to Joe's net V gross distinction?

Best,
Robyn DeYoung

On Dec 14, 2015, at 5:04 PM, Bryson, Joe <Bryson.Joe@epa.gov> wrote:

> Hey Jeremy,
>
> Robyn says you'll think a bit and send as thoughts on this re AVERT values being based on gross or net generation. Thought I'd share my thinking quickly.
>
> Obviously using gross generation (larger # than net) results in larger denominator in emissions rates and, thus, smaller emission rates, relative to using net generation. Our CAMD friends say that the difference between the two is on average around 7% but varies a lot by plant type w/ coal plants having parasitic loads >10% of gross generation and NGCC's having values <5%. The way I think of it, is that by using net one is assigning responsibility for all emissions of the plant across the generation that's provided to meet load (aka, net generation out) and, in effect, all the parasitic loads and associated emissions and, thus, being assigned as responsibility of the causers of the load on the grid. I think this is the right approach. To do otherwise alleviates the responsibility for parasitic loads/emissions from end-use demand as if they would occur absent end-use demand, which is not the case.
>
> Not sure that's clear, but gives you a quick sense of my thinking.
>
> Question: data sources for AVERT do have both types of generation, yes? So data availability is not the issue, right?
>
> Thanks!
>
> Best,
>
> Joe

Joe Bryson

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